



THE CITY OF NEW YORK
LAW DEPARTMENT

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July 17, 2023

BY ECF

Honorable Sanket J. Bulsara
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Colette Cunningham v. City of New York, et al.
22-CV-588 (LDH) (SJB)

Your Honor:

I am a Senior Counsel in the Office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel for the City of New York, and attorney for defendants City of New York, Officer Pedro Lopez, Sergeant Suhail Sofizada, and Officer Aaliyah Card (“defendants”) in the above-referenced matter. The parties write jointly to respectfully request that the deadline for fact discovery be extended for two months from July 19, 2023 until September 19, 2023, and a corresponding adjournment for subsequent deadlines, including the deadline for expert discovery, from October 27, 2023 until December 27, 2023. The parties have jointly requested two prior extensions of discovery, which were both granted by the Court.

By way of background, the parties have completed paper discovery. However, the parties require the requested extension of time in order to take depositions. The parties have scheduled the deposition of plaintiff for July 24, 2023 and the deposition of defendant Lopez for August 11, 2023. In addition, the defendants intend to take the deposition of two (2) to three (3) nonparties after the parties’ depositions are completed.

Accordingly, the parties respectfully request that the deadline for fact discovery be extended for two months from July 19, 2023 until September 19, 2023, and a corresponding adjournment for subsequent deadlines, including the deadline for expert discovery, from October 27, 2023 until December 27, 2023.

The parties thank the Court for its consideration herein.

Respectfully submitted,

/s/ Gregory J.O. Accarino

Gregory J.O. Accarino
Senior Counsel
Special Federal Litigation Division

cc: **By ECF**
All Attorneys of Record